ARIEL TAYLOR, (No. 10123) **CRAMER & TAYLOR, LLC**

Attorney for Defendant 132 West Tabernacle BLDG A St. George, UT 84770

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IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case Number: 4:21-cr-00070-DB

CHRISTOPHER MARTIN,

Defendant.

Judge: David Barlow

COMES NOW the Defendant, Christopher Martin, by and through his attorney, Ariel Taylor and hereby files this Motion to Suppress.

Pursuant to Rule 12(b)(3)(C) of the Federal Rules of Criminal Procedure and Rule 12-1(j) of the Utah Local Rules of Criminal Procedure, the defendant alleges in avers as follows:

- 1. The defendant has standing to bring this motion in that he is the person charged with federal crimes allegedly committed in the State of Utah.
- 2. The evidence for which the suppression is sought is the officers' observations and the evidence seized by them after the stop of the defendant in a vehicle.
- 3. The issues raised as grounds for the motion are violations of the defendant's Fourth and Fifth Amendment rights. The defendant was seized from his vehicle, the vehicle

was searched, and items seized in violation of the Fourth Amendment, and he was interrogated in violation of his Fifth Amendment rights.

The defendant requests an evidentiary hearing upon the facts involved in the case and to allow both parties to brief the facts after evidence is presented from law enforcement officers while under oath.

Dated this 2 day of December 2022.

/s/ Ariel Taylor Aric Cramer Attorney at Law

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

United States Attorney's Office-St. George Jay Winward 20 N Main St Ste 208 St. George, Utah 84770 via electronically

/s/ Ariel K Taylor